

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

| | | |
|---------------------------|---|----------------------|
| UNITED STATES OF AMERICA, | : | |
| | : | |
| Plaintiff, | : | Case No. 3:15-CR-148 |
| vs. | : | |
| | : | |
| WILLIAM M. APOSTELOS, | : | Judge Thomas Rose |
| | : | |
| Defendant. | : | |

UNOPPOSED MOTION TO MODIFY BOND TO ALLOW TRAVEL

Now comes the Defendant, WILLIAM M. APOSTELOS, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond allowing him to travel to his stepson's home located at 9281 Heritage Glen Drive, Miamisburg, Ohio 45342 on December 24, 2015 from 4:00 p.m. until 10:00 p.m., to celebrate Christmas Eve as well as his stepson's birthday. Defendant is willing to comply with any additional conditions that the Court may require. Assistant United States Attorney Brent Tabacchi has no objection to this request; United States Pretrial Officer Kelvin Gover also has no objection to this request.

Respectfully submitted,

DEBORAH L. WILLIAMS,
FEDERAL PUBLIC DEFENDER

s/F. Arthur Mullins
F. Arthur Mullins (0080483)
Assistant Federal Public Defender
One Dayton Centre, Suite 490
1 South Main Street
Dayton, Ohio 45402
(937) 225-7687

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Brent Tabacchi, Assistant United States Attorney, by electronic filing, this 17th day of December, 2015.

s/F. Arthur Mullins _____
F. Arthur Mullins

Art_Mullins@fd.org

Attorney for Defendant
William M. Apostelos